



Maryland Department of Environment
Water Management Administration
Compliance Program - Western Division
33 W Franklin St, Ste 302, Hagerstown, MD 21742
301-665-2850

Field Inspection Report by: Oladapo John

Media Type(s): NPDES Industrial Minor Surface Water

Inspection Date: August 8, 2012

Site Name: National Archives & Records Administration

Facility Address: 8601 Adelphi Rd, College Park, MD 20740

County: Prince George's County

NPDES Industrial Minor Surface Water

Permit / Approval Numbers: 09-DP-2904/MD0065871

Site Status: Active

Site Condition: Noncompliance

Contact(s):

Lawrence M. Holley Sr. – NARA Representative

Jim Craig – MDE

Walter D. Hayes – LB&B Program Manager

Jonathan Mack – LB&B Safety/QA Manager

Ivan W. Austin – LB&B Chief Engineer

Recommended Action: Additional Investigation Required, Continue Routine Investigation

Inspection Reason: Violation Follow-up

Evidence Collected:

Visual Observation

Inspection Findings:

This date, Mr. Jim Craig of MDE and I made a follow-up inspection at the above facility to determine the compliance status of the industrial discharge permit associated with the site. Mr. Jonathan Mack of LB&B met us at the security post; we advised him of our visit and later followed him to his office. While there, we reviewed the DMR for the 2nd quarter of 2012, he further advised LB&B already mailed a copy to our Baltimore office. After the review, we noticed the following excursions for both Zinc and Copper. Mr. Jonathan advised LB&B will have a meeting with NALCO the following day to iron out the issue. In the interim I recommend NARA to submit a letter or report within the next five business days identifying excursions, what caused it and what might be done to prevent future occurrence.

Mr. Ivan Austin, the engineer also of LB&B joined us on an inspection of the cooling tower and the blow down trend. Mr. Austin advised the facility now discharge combination of both city and well water between 25,000 – 40,000 gallons through outfall 001 everyday. Visual observation at the time of this inspection, show no form of discharge at outfall 001 today. I requested for the field notes showing the weather condition, the daily flow, time and date, Mr. Austin advised apart from the daily flow reading from the meter, all other measurements and records are made by

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NALCO representative once every month. I advised the facility to invest in measuring equipments (Ph, DO and Chlorine meters) especially with the above mention excursions values.

The permit (Pages 5-8) states that within three months of effective date of the permit, the permittee should submit to MDE a plan to evaluate the wastewater toxicity at the outfall 001 by using biomonitoring index. The compliance program has not yet receive this plan with over 2 years into the permit.

After conducting this inspection meeting with the permittee and their contractor, and reviewing the approved permit, the following items must be completed to bring the facility into compliance.

- Address the excursions issues (Copper and Zinc) and submit the reason within 5 business days of receiving this report.
- Create and maintain field note showing time and date, daily flow rate. During periodical blow down (cleaning the cooling tower) monitor and record the following physiochemical parameters (DO, Ph, and Residual Chlorine) and include all information outlined in the permit.
- The compliance program requires the permittee and contractor to submit name and Address of laboratory for our record purpose.
- Conduct and submit a wastewater toxicity plan using Biomonitoring index.

STATE LAW PROVIDES FOR PENALTIES FOR VIOLATIONS OF MARYLAND ENVIRONMENTAL ARTICLE TITLE 9. THE MARYLAND DEPARTMENT OF THE ENVIRONMENT MAY SEEK PENALTIES FOR THE AFORMENTIONED VIOLATIONS OF TITLE 9 ON THIS SITE

NPDES Industrial Minor Surface Water - Inspection Checklist

<i>Inspection Item</i>	<i>Status</i>	<i>Comments</i>
1. Does the facility have a discharge permit? [Environment Article §9-323a(1-3)]	No Violations Observed	
2. Is the discharge permit current? Has facility applied for renewal? [Environment Article §9-328a(1)]	No Violations Observed	
3. Is the facility as described in the current permit? Are treatment processes as described in the current permit? [COMAR 26.08.04.01.01B(4)]	Out of Compliance	The treatment process is not in compliance with the current permit
4. Has notification been submitted about any new, different or increased discharges? [40 CFR Part 122 Subpart C Section 122.42.b(1-3)]	No Violations Observed	
5. Is the number and location of discharge points as described in the discharge permit? [Environment Article §9-3314]	No Violations Observed	
6. Has permittee submitted correct name and address of receiving waters? [40 CFR 122.21.j(3)]	No Violations Observed	
7. Is the permittee meeting the compliance schedule per permit requirements? [COMAR 26.08.04.02-1.02-1A(3)]	No Violations Observed	
8. Has the operator or superintendent been certified by the Board in the appropriate classification for the facility? [COMAR 26.06.01.05A(1)]	No Violations Observed	

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9. Are adequate records being maintained for the sampling date, time, and exact location; analysis dates and times; individual performing analysis; and analytical results? [COMAR 26.08.04.03.03B(3)(a, b, c, e)]	Out of Compliance	Adequate records and field notes are not maintained for the sampling date, time and exact location
10. Are adequate records being maintained for the analytical methods/techniques used? [COMAR 26.08.04.03.03B(3)(d)]	Out of Compliance	Adequate records are not maintained for analytical methods/techniques used
11. Does the permittee retained a minimum of 3 years worth of monitoring records including raw data and original strip chart recordings; calibration and maintenance records; and reports? [COMAR 26.08.04.03.03B(1)]	No Violations Observed- Violation Trend Observed	
12. Is the lab and monitoring equipment being properly calibrated and maintained? Are they keeping records to reflect this? [Environment Article §9-3313]	Not Evaluated	
13. Is laboratory controls and appropriate quality assurance procedures properly operated and maintained? [40 CFR Part 122 Subpart C Section 122.41.e]	Not Evaluated	
14. Has the permittee submitted the monitoring results on the proper Discharge Monitoring Report form? [COMAR 26.08.04.03.03C(1)]	No Violations Observed	Permittee is currently going through DMR approval
15. Has the permittee submitted these results within the allotted time? [COMAR 26.08.04.03.03C(2)]	No Violations Observed	
16. Are discharge monitoring reports complete and reflect permit conditions? [COMAR 26.08.04.03B(3)]	Out of Compliance	DMR's does not reflect the permit conditions
17. Is the facility being properly operated and maintained including:(a) stand-by power or equivalent provisions available, (b) adequate alarm system for power or equipment failure available, (c) all treatments units are in service, . [40 CFR Part 122 Subpart C Section 122.41.e]	Not Applicable	
18. Is sewage sludge managed correctly per permit requirements? [COMAR 26.04.06.03.03]	Not Applicable	
19. Any by-pass since last inspection? Has permittee submitted notice of any by-pass? [40 CFR Part 122 Subpart C Section 122.41.m(4)(i)(C)]	Not Applicable	
20. Any non-complying discharges experienced since last inspection? Has regulatory agency been notified? [40 CFR Part 122 Subpart C Section 122.41.l(6)]	Not Evaluated	
21. Have overflows occurred since the last inspection? [COMAR 26.08.10.02A]	Not Applicable	

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22. Has records of overflows been maintained at the facility for at least five years? [COMAR 26.08.10.06A-B]	Not Applicable	
23. Are flow measuring devices properly installed and operated, calibration frequency of flow meter adequate, flow measurement equipment adequate to handle expected ranges of flow? [40 CFR Part 122 Subpart C Section 122.41.e]	Not Evaluated	
24. Are discharge monitoring points adequate for representative sampling? Do parameters and sampling frequency meet the minimum requirements? Does the permittee use the method of sample collection required by the permit? [Environment Article §9-331(4)]	Out of Compliance	The parameter sampling does not meet the minimum requirements
25. Are analytical testing procedures approved by EPA? If alternate analytical procedures are used, proper approval has been obtained? [COMAR 26.08.01.02B(1)]	Out of Compliance	Adequate records and field notes are not maintained for the sampling date, time and exact location
26. Has the permittee notified the Department of the name and address of the commercial laboratory? [COMAR 26.08.04.03.03A(3)]	No Violations Observed	
27. Were discharges observed at the authorized outfalls? Does the facility have any unauthorized discharges to waters of the State? [Environment Article §9-322]	No Violations Observed	
28. Does the discharges or receiving waters have any visible pollutants (oil sheen, grease, turbidity, foam, floating solids, color), odor, noncompliant DO concentrations, and/or noncompliant temperature ranges? [Environment Article §9-314b(1)]	No Violations Observed	
29. Were discharge samples collected? [Environment Article §9-261c(1)]	No Violations Observed	
30. Is the facility required to have a storm water pollution prevention plan? Has storm water pollution prevention plan been developed and implemented as required? Does storm water pollution prevention plan require modifications to prevent runoff of pollutants? [40 CFR Part 122 Subpart B Section 122.26.c(1)(I)(A-B)]	No Violations Observed	
31. Are the permit conditions being met? [Environment Article §9-326a(1)]	Out of Compliance	Permit conditions are not being met

Inspector: _____
 Oladapo John

Received by: _____